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February 27, 2009
Via ECFS

Ms. Marlene H. Dortch, FCC Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

**RE: EB Docket No. 06-36
Annual 64.2009(e) CPNI Certification for 2008
Core 180, Inc. - Form 499 Filer ID 825931**

Dear Ms. Dortch:

Enclosed for filing is the 2008 CPNI Compliance Certification submitted on behalf of Core 180, Inc. This filing is submitted pursuant to 47 C.F.R. Section 64.2009(e) and in accordance with the Public Notice DA 09-9 issued January 7, 2009.

Any questions you may have concerning this filing may be directed to me at 470-740-3005 or via email to mbyrnes@tminc.com.

Sincerely,

Monique Byrnes
Consultant to
Core 180, Inc.

Attachments

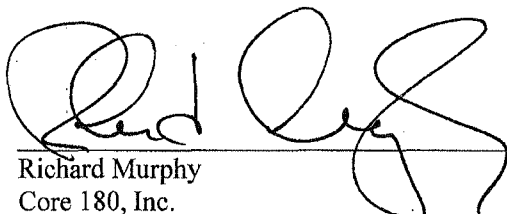
MB/sp

cc: FCC Enforcement Bureau (2 copies)
Best Copy and Printing (via email to FCC@BCPIWEB.COM)
R. Murphy – Core 180
file: Core 180 - FCC
tms: FCCx0901

Annual 64.2009(e) CPNI Certification for: Calendar Year 2008
Date Filed: February 27, 2009
Name of Company covered by this certification: Core 180, Inc.
Form 499 Filer ID: 825931
Name of Signatory: Richard Murphy
Title of Signatory: President / COO

I, Richard Murphy certify and state that:

1. I am the President and COO of Core 180, Inc. and, acting as an agent of the Company, and, acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. Section 64.2001 *et seq.*
2. Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in Section 64.2001 *et seq.* of the Commission's rules.
3. The company has not taken any actions against data brokers in the past year.
4. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.


Richard Murphy
Core 180, Inc.

2-27-09
Date

Attachment A
Statement of CPNI Procedures and Compliance

Core 180, Inc.

Calendar Year 2008

Core 180, Inc.

Statement of CPNI Procedures and Compliance

Core 180, Inc. ("Core 180" or "Company") is a telecommunications network integrator and implements networks designed to individual to customer specifications. The Company primarily markets dedicated services to enterprise customers and to organizations responding to bids issued by government agencies or "intermediate customers". Such marketing efforts never include the use of CPNI. In addition, the Company does not provide any usage-sensitive services to customers and, with the exception of a very small number of accounts, does not have access to call detail records. Services are provided under contract and include confidentiality requirements regarding the treatment of account information, including CPNI.

Core 180 does retain CPNI information that relates to the quantity, technical configuration, type, destination, location and amount of use a telecommunications service subscribed to by its customers. However, the Company does not obtain, retain or use call detail records for any purpose. Core 180 is committed to protecting the confidentiality of all customer information, including CPNI. The Company maintains all files containing CPNI in a secure manner such that they cannot be used, accessed, disclosed or destroyed by unauthorized employees or in an unauthorized manner. The Company provides for disciplinary action for such violations, up to and including termination of employment. The provision of CPNI to any unrelated third party is strictly prohibited except for billing purposes and for the provision, maintenance and repair of services.

With respect to the call detail the Company does retain, such information is not provided to customers over the phone, on-line or in-store.

The Company has procedures in place to notify law enforcement in the event of a breach of customers' CPNI, to ensure that notification is provided in the time period set forth in the FCC's rules, or if applicable, when so authorized by law enforcement. In addition, the Company has a process to record all breaches discovered and will provide notification to the United States Secret Service, FBI and customers.

Core 180, Inc.

Statement of CPNI Procedures and Compliance
(Page 2)

The Company has not taken any actions against data brokers in the last year.

The Company did not receive any complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI, in calendar year 2008.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI or call detail records.